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WESTCOR LAND TITLE INSURANCE  
COMPANY

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

\* \* \*

DEUTSCHE BANK NATIONAL TRUST  
COMPANY AS TRUSTEE FOR NEW  
CENTURY HOME EQUITY LOAN TRUST,  
SERIES 2005-D, ASSET BACKED  
PASSTHROUGH CERTIFICATES,  
Plaintiff,

vs.

WESTCOR LAND TITLE INSURANCE  
COMPANY; DOE INDIVIDUALS I through X;  
and ROE CORPORATIONS XI through XX,  
inclusive,

Defendants.

CASE NO. 2:20-cv-01706-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO  
RESPOND TO OPPOSITION TO  
MOTION TO DISMISS [ECF 23]  
AND COUNTERMOTION FOR  
SUMMARY JUDGMENT [ECF 24]**

**[Second Request]**

COME NOW Plaintiff, Deutsche Bank National Trust Company as Trustee for New Century Home Equity Loan Trust, Series 2005-D, Asset Backed Pass-Through Certificates (“Deutsche Bank”), and Defendant, Westcor Land Title Insurance Company (“Westcor”) (collectively, the “Parties”), by and through their respective attorneys of record, and hereby stipulate and agree as follows:

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1. On August 21, 2020, Deutsche Bank filed its Complaint in Eighth Judicial District Court, Case No. A-20-819973-C [ECF No. 1-2].
2. On September 15, 2020, Westcor filed a Petition for Removal to this Court [ECF No. 1].
3. On September 22, 2020, Westcor filed a Motion to Dismiss [ECF No. 9].
4. On October 26, 2020, Deutsche Bank filed its response to Westcor's Motion to Dismiss, entitled Opposition to Motion to Dismiss and Countermotion for Summary Judgment [ECF Nos. 23 and 24].
5. Because Deutsche Bank's response to Westcor's Motion to Dismiss included a Countermotion for Summary Judgment, the deadline for Westcor to file its Reply to Deutsche Bank's Opposition [ECF No. 23] was earlier than its deadline to file its Response to Deutsche Bank's Countermotion for Summary Judgment [ECF No. 24].
6. In accordance with FRCP 1, Westcor intends to file a single memorandum of points and authorities (filed twice to comply with local rules), to respond to ECF No. 23 and ECF No. 24.
7. The parties previously discussed extending the deadline for Westcor to file its Reply and Response, extending the deadline to file its Reply by three weeks and extending the deadline to file its Response by one week, such that the deadline for both filings was extended to November 23, 2020.
8. On November 2, 2020, this Court granted Westcor's first request for an Extension [ECF No. 28].
9. In order to respond to certain factual issues raised by Deutsche Bank's Countermotion for Summary Judgment, Westcor's counsel is working with Westcor to obtain a Declaration in support of its Response.
10. Due to the Thanksgiving holiday, Westcor's counsel has requested additional time to finalize the Declaration with Westcor. Westcor seeks an extension through December 4, 2020, to file its combined Reply and Response.

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11. This extension is requested to allow counsel for Westcor additional time to review and respond to the points and authorities filed by Deutsche Bank, and to confer with Westcor regarding the same.

12. Counsel for Deutsche Bank does not oppose the requested extension.

13. This is the second request for an extension which is brought in good faith and not for purposes of delay.

DATED this 23<sup>rd</sup> day of November, 2020.

DATED this 23<sup>rd</sup> day of November, 2020.

**MAURICE WOOD**

**WRIGHT, FINLAY & ZAK, LLP**

By: /s/ Brittany Wood

By: /s/ Darren T. Brenner

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IT IS SO ORDERED.

  
UNITED STATES DISTRICT COURT JUDGE

DATED: November 23, 2020